Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney Genreral transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

> Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently.

1. Name and address of registrant Robinson, Lake, Lerer & Montgomery 1667 K Street, N.W., #900 Washington, D.C. 20006			2. Registration No. 3911	
Name of foreign principal  Intertanko		Gange-F N-0273	4. Principal address of foreign principal Gange-Rolvsgate 5 N-0273 Oslo 2, Norway	
5. Indicate whether your foreign principal is one of the follow	wing type:	·	· •	
☐ Foreign government				
☐ Foreign political party				
□ TXForeign or □ domestic organization: If either, check or	ne of the following:			
☐ Partnership	□ Committee			
☐ Corporation	☐ Voluntary group			
XX Association	□ Other (specify)			
☐ Individual—State his nationality				
6. If the foreign principal is a foreign government, state:				
a) Branch or agency represented by the registrant.				
b) Name and title of official with whom registrant deals.	N/A REGIST	OFPT.	2	
7. If the foreign principal is a foreign political party, state:	RATION AL S	<u></u> ≥96		
a) Principal address	N/A SECUR	PA PA		
b) Name and title of official with whom registrant deals.		<b>7</b>		
c) Principal aim				

8. If the foreign principal is not a foreign government or a foreign political party, a) State the nature of the business or activity of this foreign principal Intertanko is the International Association of Independent Tanker Owners. is a non-profit membership association of independent shipowners from 33 maritime countries, including the United States. b) Is this foreign principal Subsidized in whole by a foreign government, foreign political party, or other foreign principal....... Yes □ No ⊠ Subsidized in part by a foreign government, foreign political party, or other foreign principal....... Yes X No 🗆 9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.) Intertanko is controlled by its dues-paying membership, which includes 21 United States independent tanker owners. It is financed by membership revenues from U.S. and foreign members. The association is governed by a Council selected by its membership. In addition to the United States, there are member companies from Australia, Belgium, Bermuda, Canada, Chile, Cyprus, Denmark, Finland, France, Germany, Greece, Hong Kong, India, Italy, Japan, Korea, Liberia, Luxembourg, Malaysia, Monoca, the Netherlands, Norway, Panama, Peru, Saudi Arabia, Singapore, South Africa, Spain, Sweden, Switzerland, Turkey and the United Kingdom. 10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it. See answer to #9 above.

Date of Exhibit A

1/25/90

Name and Title
Mark C. Helmke
Senior Vice President and

<u>or vice President</u> General Manager Signature

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 2050; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Name of Registrant

Name of Foreign Principal

Robinson, Lake, Lerer & Montgomery

Intertanko

## Check Appropriate Boxes:

- 1.1 The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
- 2.1 There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 3.18 The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

Robinson, Lake, Lerer & Montgomery has a month to month verbal understanding with Intertanko. The fees are expected to average \$10,000.00 per month plus expenses.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Monitor the news media.

Explain to the news media through written and oral communications Intertanko's interests.

FORM CRM-155

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5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Monitor the news media.

Explain to the news media through written and oral communications Intertanko's interests.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?<sup>1</sup>
Yes [X No []]

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Various state and federal officials could possibly take action which would affect the interests of Intertanko's member companies. The nature of Robinson, Lake Lerer & Montgomery's news media activities could have an impact on their decisionmaking. The Act seems unclear on this point; caution dictates that Robinson, Lake, Lerer & Montgomery respond in this manner.

Date of Exhibit B

1/25/90

Name and Title

Mark C. Helmke Senior Vice President and General Manager Signature Signature

Publiced activity as defined in Section 1(o) of the Act means the dissemination of political propagands and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indectrinate, convert, induce, personal, or in any other way influence any agency or official of the Concernment of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.